

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

PACIFIC STOCK, INC.,)	CIVIL NO. CV04-00725 JMS/LEK
)	(Copyright Infringement)
Plaintiff,)	
)	DECLARATION OF J. STEPHEN
vs.)	STREET
)	
SOLTUR, INC., a Hawaii)	
corporation; GIGI FIORENTINO,)	
individually; LUIS ZANOTTA,)	
individually,)	
)	
Defendants.)	
)	
)	
)	

DECLARATION OF J. STEPHEN STREET

I, J. Stephen Street, do hereby declare and state under penalty of perjury as follows:

1. I am an attorney licensed to practice law in the State of Hawaii.

2. I am an attorney with the law firm of Rush Moore LLP

A Limited Liability Law Partnership, and am counsel for Plaintiff PACIFIC STOCK, INC. ("Plaintiff") in this matter.

3. I have personal knowledge of and am competent to testify to the

matters contained in this Declaration in support of Plaintiff's Motion for Sanctions Against Defendants SOLTUR, INC., GIGI FIORENTINO, Individually; and LUIS ZANOTTA, Individually ("Motion for Sanctions").

4. On December 15, 2005, my office served upon the law office of Sidney Quintal, Esq., attorney for Defendants SOLTUR, INC., GIGI FIORENTINO, Individually; and LUIS ZANOTTA, Individually, Plaintiff's First Requests for Answers to Interrogatories and Requests for Production of Documents and Things to the Defendants in the above-entitled action.

5. Attached as Exhibit A is a true and correct copy of Plaintiff's First Request for Answers to Interrogatories addressed to Defendant Gigi Fiorentino, dated December 15, 2005, in the above-entitled action.

6. Attached as Exhibit B is a true and correct copy of Plaintiff's First Request for Production of Documents and Things addressed to Defendant Gigi Fiorentino, dated December 15, 2005, in the above-entitled action.

7. Attached as Exhibit C is a true and correct copy of Plaintiff's First Request for Answers to Interrogatories addressed to Defendant Luis Zanotta, dated December 15, 2005, in the above-entitled action.

8. Attached as Exhibit D is a true and correct copy of Plaintiff's First Request for Production of Documents and Things addressed to Defendant

Luis Zanotta, dated December 15, 2005, in the above-entitled action.

9. Attached as Exhibit E is a true and correct copy of Plaintiff's First Request for Answers to Interrogatories addressed to Defendant Soltur, Inc., dated December 15, 2005, in the above-entitled action.

10. Attached as Exhibit F is a true and correct copy of Plaintiff's First Request for Production of Documents and Things addressed to Defendant Soltur, Inc., dated December 15, 2005, in the above-entitled action.

11. On January 17, 2006, responses to Plaintiff's discovery requests that were served on Defendants' counsel on December 15, 2005 were due.

12. On February 6, 2006, Plaintiff filed its Motion For Sanctions Against Defendants Soltur, Inc.; Gigi Fiorentino, Individually; and Luis Zanotta, Individually, For Failure to Respond to Discovery. By Order filed on March 31, 2006, Magistrate Judge Kobayashi ordered that Defendants comply with the discovery requests by April 10, 2006. No discovery responses or documents of any kind were produced by any of the defendants.

13. For purposes of Rule 37(a)(2)(A) of the Federal Rules of Civil Procedure and in support of Plaintiff's Motion for Sanctions, Declarant certifies to the Court that before filing this instant motion that he has conferred with Mr. Quintal in order to obtain responses to Plaintiff's discovery requests without court

action.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawaii, April 12, 2006.



J. STEPHEN STREET